

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

**THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,  
as representative of  
THE COMMONWEALTH OF PUERTO RICO, et al.,**

**PROMESA  
TITLE III  
Case No. 17-BK-3283  
(LTS)**

**Debtors<sup>1</sup>**

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**[PROPOSED] ORDER GRANTING CORRECTION OFFICER'S SUPPLEMENTAL  
MOTION FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE PRIORITY CLAIM  
AND IMMEDIATE PAYMENT OF PRE-PETITION BACK PAY JUDGMENT  
PURSUANT TO § 503(b) (1) (A) (ii) AND § 507 (a) (2) OF THE BANKRUPTCY CODE**

Upon consideration of the Urgent Supplemental Motion Requesting Order for Allowance of Administrative Expense Priority Claim and Requesting for immediate Payment (the "Motion") filed by CO's included in the consolidated judgment dated April 22, 2016 in the litigation captioned Norberto Tomassini et als case no. A MI2003-0143 and Ivan Ayala et als. Case no. A PE2005-0049, against the Department of Correction and Rehabilitation of the Commonwealth of Puerto Rico (the "DCR"), and the Court having found it has subject matter jurisdiction over this matter pursuant to section 306(a)

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

of PROMESA; and it appearing that venue in this district is proper pursuant to section 307(a) of PROMESA; and the Court having found that the CO's Parties provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; and the Court having reviewed the Motion and upon the record herein, after due deliberation thereon, the Court having found for the reasons set forth in the Motion, that good and sufficient cause exists for the granting of the relief as set forth herein, **THEREFORE, IT IS HEREBY ORDERED THAT:**

1. The Motion is GRANTED as set forth herein.
2. Pursuant to sections 503 (b) (1) (A) (ii) and 507(a) (2) of the Bankruptcy Code, made applicable in these Title III cases pursuant to section 301(a) of PROMESA, upon entry of this Order, the CO's shall have an allowed administrative expense claim (the "CO's Allowed Administrative Claim") in the Commonwealth Title III case equal to \$ 5,832,721.95 (The "Administrative Expense pre-petition Claim"),
3. The OC's Allowed Administrative Claim shall be treated and entitled to payment in full in cash pursuant to the terms governing the payment of all administrative expense claims under the Seventh Amended Plan or any other plan of adjustment confirmed in these Title III cases, or as otherwise required by applicable law.
4. Notwithstanding any applicability of any Bankruptcy Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
5. To the extent required, the Commonwealth and the FOMB, as the Commonwealth's representative in these Title III cases, are authorized to take all actions, and to execute all documents, necessary or appropriate, to effectuate the relief granted in this Order in accordance with the Motion and without further order of this Court.
6. The Court shall retain exclusive jurisdiction to hear and determine any and all disputes related to or arising from the implementation, interpretation, and enforcement of this Order.
7. This Order resolves Docket Entry No. 18282 in Case No. 17-3283

Dated: \_\_\_\_\_

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LAURA TAYLOR SWAIN  
United States District Judge